

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

RLI INSURANCE COMPANY a/s/o §
Central Planet LLC, and §
CENTRAL PLANET LLC, §
§
Plaintiffs, §
§
v. § C.A. No. _____
§
M/V SEA TRAIN §
her engines, tackle, etc., *in rem*; §
SEA BRIDGE SHIPPING §
MANAGEMENT CO., LTD.; §
HONGKONG NEW SILK ROAD §
SHIPPING LIMITED; and §
COOPER/PORTS AMERICA, LLC, §
in personam, §
§
Defendants. §

**SCHEDULE A
(IN SUPPORT OF PLAINTIFFS' ORIGINAL COMPLAINT)**

PLAINTIFFS' LEGAL STATUS

Plaintiff RLI Insurance Company was and is an Illinois corporation with an office for the transaction of business at 9025 N. Lindbergh Drive, Peoria, Illinois 61615.

Plaintiff Central Planet LLC was and is a Missouri limited liability company with an office for the transaction of business at 967 Gardenvie Office Parkway, Suite 11, Saint Louis, Missouri, 63141.

DEFENDANTS' LEGAL STATUS

Defendant, Sea Bridge Shipping Management Co., Ltd. (“Sea Bridge”), was and is a Chinese corporation with an office for the transaction of business at Building 29, Haiyin Changtian, Lingshanwei Street, Huangdao District, Qingdao. At all material times hereto, Sea Bridge was and is the owner, owner *pro hac vice*, charterer, operator, and/or manager of the M/V SEA TRAIN.

Defendant, Hongkong New Silk Road Shipping Limited (“Silk Road”), is a Chinese company with and office for the transaction of business at Room 1401, 14th Floor, World Commerce Centre, 7-11, Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong, China. At all material times hereto, New Silk Road was and is owner, owner *pro hac vice*, charterer, operator, and/or manager of the M/V SEA TRAIN.

Defendant, Cooper/Ports America, LLC (“C/PA”), is a domestic limited liability company with its principal place of business in Alabama, doing business in the state of Texas for the purpose of monetary profit. C/PA is in the commercial business of providing stevedoring services to ocean vessels at the port of Houston, Texas. C/PA may be served with process through its registered agent, David Morgan, 2315 McCarty Drive, Houston, Texas.

Defendant, M/V SEA TRAIN was an ocean carrying vessel of cargo set forth in, and pursuant to, a contract of carriage described below; at all relevant times, said vessel was and is owned, chartered, operated and/ or managed by Defendant, Sea Bridge

Shipping Management Co., Ltd., Building 29, Haiyin Changtian, Lingshanwei Street, Huangdao District, Qingdao and/or Hongkong New Silk Road Shipping Limited, Room 1401, 14th Floor, World Commerce Centre, 7-11, Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong. M/V SEA TRAIN may be within the district during the pendency of this action.

PARTICULARS OF CLAIM

Carrying Vessel: M/V SEA TRAIN - Voyage No. 2101

Port of Loading: Qingdao, China

Port of Discharge: Houston, Texas, USA

Bill of Lading: Nos. SXUQSTQDHU07F, SXUQSTQDHU07A, SXUQSTQDHU07B, SXUQSTQDHU07D, SXUQSTQDHU07E, SXUQSTQDHU07C, and SXUQSTQDHU07G

Shipper: Suzhou Oriental Dragon Import and Export Corp. Ltd.
Zhangjiagang, Jiangsu, China 215600

Consignee: Central Planet LLC
967 Gardenview Office Parkway, Suite 11
St. Louis, Missouri 63141, USA

Notify Party: Central Planet LLC
967 Gardenview Office Parkway, Suite 11
St. Louis, Missouri 63141, USA

Cargo: 529 Crates European Red Pine Plywood

Nature of Loss: Damage

Amount of Loss: \$1,627,018.60

Kennedy Lillis Schmidt & English Reference: 6471